

From

11/29/2024

Raghu Duggirala

I-28 Dream Dr

Wind Gap, PA, 18091

To

District Court Judge

Eastern District of Pennsylvania

11613 U.S. Courthouse

601 Market Street Philadelphia, PA 19106

REC'D NOV 29 2024

Dear Sir/Madam,

Subject: Dismissal of Amended Complaint on November 21st – reg.,

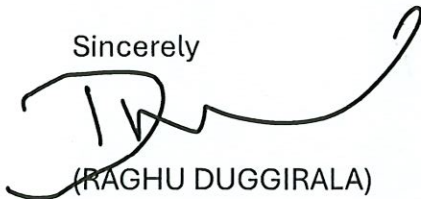
Reference: Motion of Reassignment of Judge – Document 52 Dt 11/29/2024

Case 5-24-CR
A - 02047

In my earnest attempt to amicably resolve this escalating complexity, I am submitting a fresh grievance, specifically addressing the Arbitration misconduct and encompassing all involved parties. If feasible, I would appreciate the consolidation of these two cases.

Respectfully submitted.

Sincerely



(RAGHU DUGGIRALA)

PRO SE PLAINTIFF

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

RAGHU DUGGIRALA

(In the space above enter the full name(s) of the plaintiff(s).)

- against -

1. TATA CONSULTING SERVICE LIMITED

2. LITTLER MENDELSON, P.C.

3. AMERICAN ARBITRATION ASSOCIATION

4. Thomas D. Rees esq

COMPLAINT

Jury Trial: ☒ Yes ☐ No

(check one)

REC'D NOV 29 2024

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	Mr. RAGHU DUGGIRALA
	Street Address	I-28 DREAM DR
	County, City	NORTHAMPTON WIND GAP
	State & Zip Code	PA 18091
	Telephone Number	215-688-7099

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name TATA CONSULTING SERVICES LIMITED (TCS)
 Street Address 379 Thornall St Ste 22
 County, City Middlesex Edison
 State & Zip Code NJ 08837

Defendant No. 2 Name LITTLER MENDELSON, P.C.
 Street Address Three Parkway 1601 Cherry Street, Suite 1400
 County, City Philadelphia , Philadelphia
 State & Zip Code PA 19102.1321

Defendant No. 3 Name AMERICAN ARBITRATION ASSOCIATION
 Street Address 230 South Broad Street, 12th Floor
 County, City Philadelphia , Philadelphia
 State & Zip Code PA 19102

Defendant No. 4 Name Thomas D. Rees, Esq. High Swartz LLP - Partner
 Street Address 40 E Airy St
 County, City Montgomery , Norristown
 State & Zip Code PA , 19401

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)
☒ Federal Questions ☒ Diversity of Citizenship
- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Federal Arbitration Act (FAA) §10(a) , Pain & Suffering ,
Intimidation 18 U.S.C. § 241 , 42 U.S. Code § 3617, 18 U.S. Code § 1514
Rule 502 of the Federal Rules of Evidence, Federal law for privileged
correspondence 18 , U.S. Code § 1001

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship US Citizen

Defendant(s) state(s) of citizenship US Citizen

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? Intimidation , Aggressive Workstyle, Unethical, Unprofessional worktyle , Harassment , fraudulent actions during the Arbitration process.

B. What date and approximate time did the events giving rise to your claim(s) occur? July 23,2024 to November 29th 2024

C. Facts: Sheet Attached

What
happened
to you?

Who did
what?

Details Given in the Attached Sheet

Was
anyone
else
involved?

The Unauthorized persons were copied in the communication and were added later
~~without any request to add them by the American Arbitration Association case manager~~

Who else
saw what
happened?

No one saw the incident but few from TCS participated in the meeting

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. Stress, Distress , near psychological break down, trauma
pain & suffer , Intimidation ,fear out of fraudulent actions

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

Relief from All defendant's can be decided by the Jury.

50% of the relief will be used for charity activities by the plaintiff.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 29th day of November, 2024.

Signature of Plaintiff



Mailing Address RAGHU DUGGIRALA

I-28 DREAM DR

WIND GAP , PA, 18091

Telephone Number 215 688 7099

Fax Number (if you have one) _____

E-mail Address RDRALA@YAHOO.COM

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _____, 20____, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: _____

Inmate Number _____

1. An unprecedented situation arose when three individuals, including Fanya Hoffman, Keith Pare, and Sheldon Hinds utilized the same email address as Kyle Rodriguez the case manager for the American Arbitration Association (AAA). This led to a significant amount of confusion due to the conflicting responses provided by each individual.
2. The AAA, however, did not seek clarification from the arbitrators about their relationship with the defendant's counsel or their company. The claimant(Plaintiff) was blindsided by this information, which was only revealed through disclosure after selection. Despite the claimant's objections, the defendant's counsel remained steadfast in their refusal to change the arbitrator.
3. The audio quality of the AAA's conference bridge was subpar, and the initial conference could have been conducted at their Philadelphia office with remote participants joining through Zoom. Unfortunately, no policy exists for recording these audio conferences.
4. The claimant requested the arbitrator to review all the exhibits on the AAA portal before the first conference, but preparations only began five days before the meeting. According to the invoice, the arbitrator did not review the exhibits.
5. The AAA case (01-24-0006-6253) took an unexpected turn when the defendant's lead representative requested that Christine Agbelese be included in all communications. Despite not being asked, the case manager also added Rhonda Kochmar as a representative, against the claimant's wishes.
6. The claimant requested information about two counsels' August 29th Zoom meeting where their new counsel withdrew from the case, fearing that the defendant's counsel would take control of the October 29th meeting. As predicted, the meeting was hijacked by Mr. Hank, who dictated the arbitrator's actions.
7. From the onset of arbitration, the lead representative, Mr. Hank, forcefully dictated terms. His unnotified engagement with the plaintiff's new counsel, coupled with his dissemination of defamatory information, led to the counsel's withdrawal, leaving the plaintiff self-represented and distressed.
8. The arbitrator did not go through the claimant's exhibits but read the 17-point agenda email response of an unauthorized person by taking 30-minute breaks during the first conference meeting. The arbitrator issued the order based on this 30-minute reading and has given months for responses from both parties. The arbitrator timelines are in line with Mr. Hank's initially proposed timelines.
9. The claimant repeatedly sought a more professional reconvening of the initial conference, but to no avail. The initial arbitration stage demonstrates a bias, as three out of four parties are in cahoots.